

Coey, Dennis

From: Cramer, Marty A.
Sent: Tuesday, September 02, 1997 8:03 AM
To: Coey, Dennis; Rogers, Anita K.
Subject: RE: Portland Sediments
Importance: High

Anita and Dennis:

I believe Chevron is planning to take their sediments to Ross Island as we are unless something has changed. I have not had a chance to look any further into the contaminant levels to see how bad they really are and if they are any different than what anyone else takes to Ross Island. The only other choices for disposal are dumping in the or ocean at a designated area but that is pretty complicated and much harder to get approval or taking it to a haz waste landfill which is very expensive. Ross Island also accepts other types of materials such as construction debris, fill, various types of solid wastes, and others which makes it a bit scary as it could lead to future liability if these other wastes turn out to be hazardous and create problems at the landfill. Unfortunately, we really don't have any other cost-effective options.

My hopes were the samples would come back clean so we would have documentation that we never put anything hazardous into the landfill thereby limiting or eliminating liability. There is a good possibility that our sediments are no worse than anyone elses and although it could present some future liability, we would be following standard practices.

I will look into it further and let you know what I find out and will try and provide specific answers to your questions Anita.

Marty

From: Rogers, Anita K.
Sent: Friday, August 29, 1997 5:31 PM
To: Cramer, Marty A.; Coey, Dennis
Subject: RE: Portland Sediments

Marty,

Do you know where Chevron will be disposing of their sediment? Are you concerned with potential clean-up liability if we dispose of sediment that may be concerned hazardous by some but not by the state? Do you know if this is common practice in Oregon?

Anita

-----Original Message-----

From: Cramer, Marty A.
Sent: Friday, August 29, 1997 5:28 PM
To: Coey, Dennis; Rogers, Anita K.
Subject: Portland Sediments
Importance: High

Dennis and Anita:

I spoke to Pacific today about the sediment sampling results for the dock dredging project and they

said the a few of the PAHs (carcinogens) and metals were pretty high but most everything else was not too bad. The reporting limit they listed was actually the laboratory detection limit and has nothing to do with the agencies. As I thought, there are no sediment standards for Oregon or the US. Most everyone references the Puget Sound sediment standards for marine waters unless they have specific standards for their state or region. Because these are not marine waters the Puget Sound standards should not apply. Also, Chevron's samples had similar levels to ours indicating that it may be a widespread problem. We will be sampling sediments upstream and downstream of the terminal as part of the remediation program which will provide additional information on how widespread the problem is but that may not be done until just before we dredge. The main issue may be if we want to dispose of contaminated sediments in an unsecured landfill such as Ross Island.

Food for thought.

Call if you have questions.

Marty